

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,	*
Plaintiff,	*
	*
V.	*
	*
	CRIMINAL NO. 22-100 (ADC)
	*
FRANCOIS JEAN (3),	*
Defendant.	*
	*

MOTION FOR DISCOVERY AND INSPECTION

TO THE HONORABLE AIDA DELGADO COLON,
JUDGE OF THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO.

COMES NOW defendant FRANCOIS JEAN through the undersigned attorney, and very respectfully states and prays:

1. On December 7, 2022 the Presentence Report [hereinafter PSR] was disclosed. (Doc. 62)
2. On December 8, 2022, the defendant gave notice of the objection to the PSR in an email addressed to the Probation Officer and to A.U.S.A. Perez as per Local Rule 132(b)(3)(A). See Exhibit A.
3. On December 29, 2022, the government responded to the defendant's objection to the PSR. See Exhibit B.

4. On January 3, 2023 the Probation Officer addressed an email to counsel with the information contained in the Addendum to the PSR filed at doc. 66. See Exhibit C.

5. Once counsel received formal notice that the matter of the objection had been resolved against the defendant, a formal objection was filed at doc. 70.

6. The government has moved to continue the sentencing hearing and announced that experts will be called to testify during the sentencing hearing.

7. The defendant requests fair notice of the experts' curriculum vitae, their reports, any notes generated and any documents they use in support of their conclusions and testimony.

8. Similarly, the defendant requests to be afforded sufficient time to study these documents in order to consult and hire experts to assist him in this matter.

WHEREFORE it is respectfully requested that the government be ordered to produce all documents pertaining to the experts' training and opinion at least sixty (60) days prior to the date of the sentencing hearing and that the defendant be allowed to consult and retain experts that may assist him in the matter.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 10th day of January, 2023.

S/Laura Maldonado Rodriguez
LAURA MALDONADO RODRIGUEZ

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this MOTION was filed through the CM/ECF system and served on all designated parties.

In San Juan, Puerto Rico this 10th day of January, 2023.

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